

**Hazel Roby, as Administratrix of the Estate
of Ronald Tyrone Roby, Deceased**

v.

Benton Express, Inc.

**Exhibit F
Plaintiff's Response to
Defendant's Reply Brief**

Affidavit of Roland Brown

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

**HAZEL M. ROBY, as Administratrix of
the Estate of RONALD TYRONE
ROBY, Deceased,**

Plaintiff,

v.

BENTON EXPRESS, INC., et al,

Defendants.

CIVIL ACTION NO.
2:05cv494-B

AFFIDAVIT OF ROLAND B. BROWN


STATE OF FLORIDA

COUNTY OF

Personally appeared before me, the undersigned Notary Public in and for said County and State, the within named Roland B. Brown, who, after first being duly sworn, states as follows:


1. I, Roland Brown was hired by the Plaintiff in this case to testify as a safety expert.
2. On December 6, 2005, I was deposed by Attorney Gregory Brockwell, counsel for Benton Express. It is my intent to make absolutely clear my opinion on December 6, 2005 that it is the industry standard and best practice for all trucking companies is to have GPS tracking devices on their trucks. In fact, in my deposition I, specifically, stated that I have recommended GPS tracking to clients. (Exhibit 1).

Further, Affiant sayeth not:


Roland B. Brown

SWORN TO and SUBSCRIBED before me on this the 3rd day of February
2006.




NOTARY PUBLIC

My Commission Expires: 4-26-09